

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington

August 6, 2020

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

1. RAOUL V. NORMANDIA, JR.,

2. CHASE FRIEDRICH, and

3. IVAN ARMENTA,

Defendants.

NO. **CR20-110 RSL**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**Conspiracy to Distribute Fentanyl**

Beginning at a time unknown, but within the last year, and continuing until on or about April 21, 2020, at Des Moines, in King County, within the Western District of Washington, and elsewhere, RAOUL V. NORMANDIA, JR. and CHASE FRIEDRICH, and others known and unknown, did knowingly and intentionally conspire to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a substance controlled under Title 21, United States Code, Section 812.

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 846.

**COUNT 2**

**Distribution of Fentanyl**

On or about April 17, 2020, in Des Moines, in King County, within the Western District of Washington, the defendant, CHASE FRIEDRICH, knowingly and intentionally distributed to defendant IVAN ARMENTA a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a Schedule II controlled substance under Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT 3**

**Distribution of Fentanyl**

On or about April 17, 2020, in Kitsap County, Washington, within the Western District of Washington, the defendant, IVAN ARMENTA, knowingly and intentionally distributed a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, also known as fentanyl, a Schedule II controlled substance under Title 21, United States Code, Section 812.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT 4**

**Possession of Fentanyl and Cocaine with Intent to Distribute**

On or about April 21, 2020, in Des Moines, in King County, in the Western District of Washington, and elsewhere, the defendant, CHASE FRIEDRICH, knowingly and intentionally possessed with intent to distribute (1) a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide,



1 also known as fentanyl, and (2) cocaine, both Schedule II controlled substances under  
2 Title 21, United States Code, Section 812.

3 The Grand Jury further alleges that this offense was committed during and in  
4 furtherance of the conspiracy charged in Count 1, above.

5 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).  
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7  
8 **COUNT 5**

9 **Possession of a Firearm in Furtherance of a Drug Trafficking Offense**

10 On or about April 21, 2020, in Des Moines, in King County, in the Western  
11 District of Washington, and elsewhere, the defendant, CHASE FRIEDRICH, knowingly  
12 possessed a firearm, to wit: a Glock .380 caliber handgun, serial number ABMN255, in  
13 furtherance of a drug trafficking crime for which he may be prosecuted in a court of the  
14 United States, to wit: *Conspiracy to Distribute Fentanyl*, as charged in Count 1, and  
15 *Possession of Fentanyl and Cocaine with Intent to Distribute* as charged in Count 4.

16 All in violation of Title 18, United States Code, Section 924(c)(1)(A).  
17

18 **COUNT 6**

19 **Possession of MDMA and Cocaine with Intent to Distribute**

20 On or about April 24, 2020, in Federal Way, in King County, within the Western  
21 District of Washington, and elsewhere, the defendant, RAOUL V. NORMANDIA, JR.,  
22 knowingly and intentionally possessed with intent to distribute (1) 3,4-  
23 methylenedioxymethamphetamine ("MDMA"), a Schedule I controlled substance under  
24 Title 21, United States Code, Section 812; and (2) cocaine, a Schedule II controlled  
25 substance under Title 21, United States Code, Section 812.

26 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).  
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**COUNT 7****Possession of a Firearm in Furtherance of a Drug Trafficking Offense**

On or about April, 2020, but not later than April 24, 2020, in Federal Way, in King County, in the Western District of Washington, and elsewhere, the defendant, RAOUL V. NORMANDIA, JR., knowingly possessed a firearm, to wit: a FNH 5.7 handgun, serial number 38623217, and a Bushmaster XM15-E2S rifle, serial number L241955, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: *Conspiracy to Distribute Fentanyl*, as charged in Count 1, and *Possession of MDMA and Cocaine with Intent to Distribute* as charged in Count 6.

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

**ASSET FORFEITURE ALLEGATIONS**

All of the allegations contained in this Indictment are realleged and incorporated by reference for the purpose of alleging forfeiture.

**Count 1**

Upon conviction of the offense alleged in Count 1, the defendants CHASE FRIEDRICH and RAOUL V. NORMANDIA, JR. shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property that constitutes or is traceable to proceeds that each obtained as a result of the offense, as well as any property that facilitated the offense. This property includes, but is not limited to, \$10,750 in U.S. currency seized from Defendant CHASE FRIEDRICH's residence on or about April 21, 2020, and \$10,369 in U.S. currency seized from the Defendant RAOUL V. NORMANDIA, JR.'s residence on or about April 24, 2020.

**Count 2**

Upon conviction of the offense alleged in Count 2, the defendant CHASE FRIEDRICH shall forfeit to the United States, pursuant to Title 21, United States Code,



1 Section 853, any property that constitutes or is traceable to proceeds he obtained as a  
2 result of the offense, as well as any property that facilitated the offense.

3 **Count 3**

4 Upon conviction of the offense alleged in Count 3, the defendant IVAN  
5 ARMENTA shall forfeit to the United States, pursuant to Title 21, United States Code,  
6 Section 853, any property that constitutes or is traceable to proceeds he obtained as a  
7 result of the offense, as well as any property that facilitated the offense.

8 **Count 4**

9 Upon conviction of the offense alleged in Count 4, the defendant CHASE  
10 FRIEDRICH shall forfeit to the United States, pursuant to Title 21, United States Code,  
11 Section 853, any property that constitutes or is traceable to proceeds he obtained as a  
12 result of the offense, as well as any property that facilitated the offense.

13 **Count 5**

14 Upon conviction of the offense alleged in Count 5, the defendant CHASE  
15 FRIEDRICH shall forfeit to the United States, pursuant to Title 18, United States Code,  
16 Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms  
17 and associated ammunition involved in the offense, including but not limited to the Glock  
18 .380 caliber handgun, serial number ABMN255, that was seized from him on or about  
19 April 21, 2020 in Des Moines, Washington.

20 **Count 6**

21 Upon conviction of the offense alleged in Count 6, the defendant RAOUL V.  
22 NORMANDIA, JR. shall forfeit to the United States, pursuant to Title 21, United States  
23 Code, Section 853, any property that constitutes or is traceable to proceeds he obtained as  
24 a result of the offense, as well as any property that facilitated the offense.

25 **Count 7**

26 Upon conviction of the offense alleged in Count 7, the defendant RAOUL V.  
27 NORMANDIA, JR. shall forfeit to the United States, pursuant to Title 18, United States  
28 Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any

1 firearms and associated ammunition involved in the offense, including but not limited to  
2 the FNH 5.7 handgun, serial number 38623217, and Bushmaster XM15-E2S rifle, serial  
3 number L241955, that were seized from him on or about April 24, 2020 in Federal Way,  
4 Washington.

5 **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
6 any act or omission of the defendant,

- 7 a. cannot be located upon the exercise of due diligence;  
8 b. has been transferred or sold to, or deposited with, a third party;  
9 c. has been placed beyond the jurisdiction of the Court;  
10 d. has been substantially diminished in value; or  
11 e. has been commingled with other property which cannot be divided without  
12 difficulty;

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1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to Title  
3 21, United States Code, Section 853(p).  
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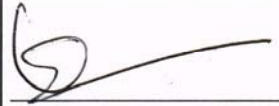
5 A TRUE BILL:  
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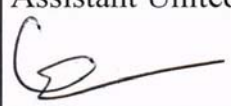
7 DATED: 8/6/2020  
8

9 *Signature of foreperson redacted*  
10 *pursuant to the policy of the Judicial*  
11 *Conference of the United States*

12 FOREPERSON  
13

14   
15 BRIAN T. MORAN  
16 United States Attorney

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18 S. KATE VAUGHAN  
19 Assistant United States Attorney

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21 LYNDIE R. SCHMALZ  
22 Assistant United States Attorney  
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